

July 7, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: ET Docket No. 13-49

Dear Secretary Dortch:

The Truck and Engine Manufacturers Association (“EMA”) hereby submits its comments on the Federal Communications Commission’s (“FCC’s”) Public Notice titled *The Commission Seeks to Update and Refresh the Record in the “Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band” Proceeding*, FCC 16-68, dated June 1, 2016 (“Public Notice”). The Public Notice invites input on potential sharing solutions between proposed U-NII devices and Dedicated Short Range Communications (“DSRC”) operations in the 5.850-5.925 GHz band (“5.9 GHz band”).

DSRC uses short-range wireless communication links in the 5.9 GHz band to facilitate information transfer between appropriately-equipped vehicles (“vehicle-to-vehicle” or “V2V”) and between appropriately-equipped vehicles and roadside systems (“vehicle-to-infrastructure” or “V2I”). The National Highway Traffic Safety Administration (NHTSA) is moving forward with a rulemaking to create a new Federal Motor Vehicle Safety Standard that will require new passenger cars to be equipped with DSRC technology to facilitate V2V and V2I communications. Additionally, we understand that NHTSA plans to promulgate a rulemaking to require compatible DSRC technology on heavy-duty vehicles for the same purpose. NHTSA is mandating DSRC so motor vehicles can communicate important safety and mobility information to one another and roadway infrastructure to avoid crashes, ease traffic congestion and improve the environment.

EMA is a trade association representing the world’s leading manufacturers of heavy-duty commercial motor vehicles. EMA member companies design and produce the heavy-duty vehicles that will be the subject of the forthcoming NHTSA rulemaking to mandate DSRC technology, and accordingly we have a direct and significant stake in any sharing solution for the 5.9 GHz band.

The FCC must protect the 5.9 GHz band for the vitally important benefits of NHTSA's V2V and V2I initiatives. We share the concerns of the Alliance of Automobile Manufacturers, Association of Global Automakers, Intelligent Transportation Society of America, and DENSO International America, Inc., and we endorse their comments on the Public Notice. Sharing of the 5.9 GHz band with unlicensed devices should be permitted only if such sharing will not interfere with DRSC's ability to provide timely and reliable safety communications.

If you have any questions, or if there is any additional information we could provide, please do not hesitate to contact Timothy Blubaugh at (312) 929-1972, or tblubaugh@emamail.org.

Respectfully submitted,

TRUCK & ENGINE
MANUFACTURERS ASSOCIATION

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